

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

WILLIAM STEFANIAK and *
JANICE STEFANIAK, *
Plaintiffs, *

CIVIL ACTION NO. 05-11465-MLW

v. *

VOYAGER III, LLC, *
WATER TRANSPORTATION *
ALTERNATIVES, INC., *
Defendants. *

JOINT REQUEST FOR A THREE MONTH EXTENSION OF DEADLINES

Due to the unexpected death of Janice Stefaniak (*see* Suggestion of Death, Document No. 21) the discovery deadlines in this case have been severely impacted (e.g. Mr. Stefaniak was tending to his wife, was involved in post-mortem familial obligations, the Defendants were unable to conduct IMEs, etc.). Additionally, the parties are currently awaiting a February 1st hearing and subsequent decision on the discovery motions recently referred to Magistrate Sorokin, which shall also have an impact on the necessary remaining discovery. Under these circumstances, the parties respectfully request a three (3) month extension of all dates not yet satisfied on the current schedule.

Respectfully submitted,
For the Plaintiffs,
WILLIAM STEFANIAK and
JANICE STEFANIAK
By their attorney,

/s/ David B. Kaplan
DAVID B. KAPLAN, B.B.O. No. 258540
THE KAPLAN/BOND GROUP
88 Black Falcon Avenue, Suite 301
Boston, MA 02210
(617) 261-0080

For the Defendants,
VOYAGER III, LLC,
WATER TRANSPORTATION
ALTERNATIVES, INC.,
By their attorneys,

/s/ Kenneth M. Chiarello
Thomas J. Muzyka, B.B.O. No. 365540
Kenneth M. Chiarello, B.B.O. No. 639274
CLINTON & MUZYKA, P.C.
One Washington Mall, Suite 1400
Boston, MA 02108
(617) 723-9165

Dated: January 18, 2007

I hereby certify that a true copy of the above document was served upon each attorney of record by ECF on January 18, 2007.

/s/ David B. Kaplan